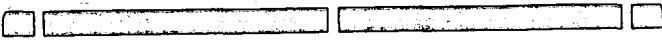


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— G-000-711.10 —

**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING NOVEMBER 31, 1987**

XX/XX/XX

**11
ENCLOSURE**

MONTHLY PROGRESS REPORT FOR PERIOD ENDING NOVEMBER 31, 1987

2665

SUMMARY

Actions associated with the Federal Facilities Compliance Agreement (FFCA) have continued during the month of November, 1987. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

The FMPC completed installation of eight (8) additional groundwater monitoring wells in support of the Remedial Investigation/Feasibility Study (RI/FS) during the month of November. The fall sampling program for the biological resources portion of the RI/FS, was completed during November 1987. Comment responses and page changes to the Task Description of Current Situation Report were submitted to USEPA on November 20, 1987.

Volume 2 of the Characterization Investigation Study (CIS) final report was issued during November 1987. Volume 3 of the CIS final report will be issued during December, 1987.

The third monthly RI/FS technical progress report was transmitted to US EPA on November 20, 1987. The fourth RI/FS technical progress report will be transmitted to US EPA during the month of December.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the US EPA signed on July 18, 1986, monthly reports are provided by US DOE to US EPA regarding the progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period of October 1 through October 31, 1987.

WORK ASSIGNMENTS AND PROGRESS

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are shown in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of assignments are presented in a format similar to that of the FFCA.

° Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. Interim Remedial Measures
Section 1.A

Comments on the CERCLA Section 1.A deliverable were received from US EPA on June 2, 1987. The FMPC responses to US EPA comments on the CERCLA Section 1.A deliverable were transmitted to US EPA on July 10, 1987.

Section 1.B

The original CERCLA 1.B deliverable was submitted on August 17, 1986. This submittal was revised to incorporate US EPA comments and resubmitted January 21, 1987. A second set of U.S. EPA comments, generated by PRC, was received on June 2, 1987. The FMPC response to the second set of US EPA comments on the CERCLA 1.B deliverable was transmitted to US EPA on July 10, 1987.

An interim stabilization plan and schedule for the K-65 silos was developed by the FMPC during the month of October. The K-65 Interim Stabilization Project has been divided into two parts which will be addressed sequentially. The first phase of this work will occur in three successive steps. A radon treatment system will be installed, followed by the application of rigid polyurethane foam to the exterior of the silos, and subsequently by application of a waterproof urethane finish to the surface. This work is scheduled for completion in December, 1987. The second phase of the project, introduction of polyurethane foam into the void space of the silos is scheduled for completion by June 1988.

In November, 1987, construction of the radon treatment system (the first part of phase one) was completed. The system was checked out and was found to operate successfully for both K-65 Silos. In addition, exterior foam application was initiated in November on K-65 Silo #1 and is currently 90% complete.

A meeting was held between WMCO, ASI and IT to discuss sampling and the feasibility investigation for the K-65 Silos. A plan for sampling the contents of the silos is currently being developed along with final remedial alternatives. Both are scheduled for completion in FY-88.

Section 1.C

On September 8 and 9, 1987 a meeting was held in Columbus, Ohio between FMPC personnel and representatives of Ohio and US EPA to review FMPC plans for interim stabilization of the the K-65 silos. During this meeting, Ohio EPA informally indicated that permits were not likely to be required in order to complete the proposed work since the actions: (1) will not result in any increase in emissions from the K-65 silos and, (2) will not result in any new emissions from the silos.

FMPC personnel met with representatives from Ohio EPA and their consultants regarding implementation of interim measures for the K-65 silos. This meeting was followed by a letter which

transmitted an alternate plan for interim stabilization and a schedule for completion of the project. This letter, dated October 26, 1987 included a discussion of the delay of K-65 internal foaming until spring of 1988, and the reasons for this action.

2. Remedial Investigation/Feasibility Study (RI/FS)

Section 2.C

Work on this section is complete.

Section 2.D

On July 21, 1987, the FMPC received written approval from the US EPA to proceed with the installation of forty-five groundwater monitoring wells. Installation of the monitoring wells was initiated on August 25, 1987.

By the end of November, the FMPC had completed installation of twenty-six monitoring wells. Eight new monitoring wells; 152, 252, 184, 284, 384, 251, 351, 311 were completed during November. This required the completion of 739.0 lineal feet of drilling. Wells are currently being installed at locations 367, 111, and 181. Samples were taken from cuttings from the newly installed wells, and the samples were tested for concentrations of organics and radionuclides. The concentration of organics and radionuclides in the field tested samples were not above background (as determined by field screening instruments).

The fall sampling portion of the biological resources sampling plan for the RI/FS, was completed during the month of November. Samples have been transferred to the IT Radiological Sciences Lab for analysis.

Volume 2 of the CIS Final Report was issued in November 30, 1987. Volume 3 of the CIS Final Report will be issued in December, 30 1987.

3 Reports and Record Keeping

Section 3.B

The third RI/FS monthly technical progress report was transmitted to U.S. EPA on November 20, 1987. The fourth monthly technical progress report will be transmitted during the month of December.

• Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to U.S. EPA in August 1986.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of the FMPC air monitoring network was performed in December, 1986. Mr. Franz's concerns on the location of air monitoring station No. 6 were addressed during the joint OEPA/US EPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications of the monitoring stations will be completed by January 15, 1988.

Section D.1

A proposed stack testing schedule fulfilling the requirements of Item D of the CAA section of the FFCA was transmitted to EPA on December 12, 1986. A revised stack testing schedule was transmitted to EPA September 17, 1987. The FY-88 stack testing schedule will be issued in January 1988.

During the period August 26 through August 29, 1987, stack testing was performed on FMPC emission point EPP-015 in accordance with Item D of the Clean Air Act section of the FFCA. The test involved utilizing a modified EPA method 5 procedure to provide a longer duration sampling time. The results of this stack test were transmitted to EPA on October 8, 1987.

US EPA method 5 stack testing was performed on nine (9) additional stacks during the month of September. Preliminary results obtained from particulate analyses of these stack tests was transmitted to US EPA during the month of November. The radionuclide analyses for these stacks will be transmitted as an addendum to the next quarterly emissions report.

Section E.2

Three Quarterly Particulate Emission Reports have been provided to EPA thusfar. A fourth Quarterly Particulate Emission Report covering the period from July through September of 1987 was transmitted by DOE to EPA on October 23, 1987.

Sections F and G

Work on these sections is complete.

° Resource Conservation and Recovery Act (RCRA)

Sections A and B - Items A.1 through A.7 and Items B.1 through B.5

US EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect US EPA comments. The revised Section A was transmitted to the US EPA on January 23, 1987. The revised Section B was transmitted to the US EPA on January 28 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided a second round of US EPA comments on these revised FFCA deliverables.

Section C with Items C.1 and C.2

The FMPC developed a closure plan for Waste Pit 4. The closure plan was transmitted to the US EPA on July 29, 1987. A post closure plan will be prepared following the RI/FS.

° Radiation Discharge Information

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to US EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided US EPA comments on these documents.

Three Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fourth Quarterly Liquid Discharge Report for the period from July through September, 1987 was transmitted to US EPA on October 23, 1987 with the fourth Quarterly FFCA report.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Nov-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
CERCLA ACTIONS			
1	INTERIM REMEDIAL MEASURES		
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Complete. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on 10-Jul-87. SOPs in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on 23-Jan-87. Second set of comments on original 17-Aug-86 submittal received 17-Jun-87. A comment response was transmitted to U.S. EPA on 10-Jul-87. A letter (WMCO:TD:87-573) was transmitted to DOE to delay the K-65 silo internal foaming project until Spring of 1988. DOE transmitted this information to EPA in letter DOE 83-88 dated 26-Oct-87.
1.C.	Implement radon control plan approved by the EPA.	----	A Feasibility Investigation for the control of radon emissions from the K-65 silos was transmitted to DOE via letter #WMCO:TD:87-391 on 31-Jul-87.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	The third technical progress report on the RI/FS was transmitted to US EPA on 20-Nov-87. via letter #DOE 149-88. The fourth RI/FS technical progress report will be submitted during the month of December.
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted 19-Dec-86. Supporting documents were transmitted on 30-Jan-87.

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ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received from U.S. EPA on 14-May-87. Final comments issued from U.S. EPA 24-Jun-87. Comment responses and a revised Work Plan were transmitted to EPA on 24-Aug-87.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from U.S. EPA. Drilling of the wells was initiated on 25-Aug-87. A total of 18 groundwater monitoring wells were completed by 31-Oct-87. A request to initiate additional RI/FS tasks was transmitted to DOE on 15-Oct-87 in letter #WMC0:EH:(IA):87-0293. This letter was transmitted to US EPA on 22-Oct-87 via letter #DOE 63-88.
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		A RI/FS progress report was transmitted to U.S. EPA on 16-Oct-87 via letter #DOE 52-88. The third RI/FS technical progress report will be submitted during the month of November.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Nov-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	A schedule was transmitted to DOE on 12-Aug-86 via letter #WMCO:EH:(RC):86-0102. A schedule for FY-88 was transmitted to DOE 6-Nov-87.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	A draft of the first annual progress report was transmitted to DOE 6-Nov-87 via letter #WMCO:EH:(IA):87-0381. WMCO will respond to DOE comments transmitted in letter #DOE 204-88 response due 12-Nov-87.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		In progress. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Actions to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria to be implemented by 15-Jan-88.
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. A revised schedule was transmitted 24-Jul-87. A draft of the FY-1988 schedule was transmitted to DOE 6-Nov-87 via WMCO:EH:(EC):87-0654. WMCO will revise schedule per DOE comments transmitted in letter #DOE 204-88 due 12-Nov-87.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses completed	Final stack tests were completed in September 87. Particulate analyses information was provided to DOE on 5-Oct-87 via letter #WMCO:EH:(EC):87-0579; and on 6-Nov-87 via letter WMCO:EH:(EC):87-0649. Radiological analyses will be provided as an addendum to the next quarterly report.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on 12-Dec-86. The second report was issued 20-Apr-87. The third report was issued

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Nov-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
			29-Jul-87. The fourth report was issued 19-Oct-87.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on 12-May-87. Comment response and revised deliverable was transmitted to DOE 31-Jul-87 via letter # WMCO:EH:(IA):87-0210.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a	90 days	Complete. Additional comments received

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
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STATUS OF ACTIONS AS OF
30-Nov-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	detailed groundwater monitoring plan.		from USEPA on 12-May-87. Response to be transmitted to U.S. EPA following completion of internal review.
			A Groundwater Monitoring Assessment Plan was submitted to DOE 25-Nov-87.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Final closure plan was transmitted to U.S. EPA on July 29, 1987.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.

RADIATION DISCHARGE INFORMATION

A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987.

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
30-Nov-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	discharge samples.		Third report transmitted July 29, 1987. Fourth report to be transmitted in November.

REPORTING REQUIREMENTS

B	Issue monthly progress report of	30 days	Aug. 86 issued to US EPA Sep. 86.
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